

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHRISTINA R. CURCURU,
Plaintiff,

v.

MASSACHUSETTS BAY
TRANSPORTATION AUTHORITY and
AMTRAK,
Defendants.

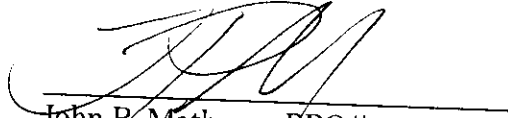
DOCKET NO.: 03-12599JLT

AFFIDAVIT OF COUNSEL

I, John P. Matheson, hereby depose and state:

1. I am the attorney of record for the plaintiff in the above-captioned matter, and a licensed member of the Bar of the Commonwealth of Massachusetts.
2. If granted access to obtain, pursuant to Massachusetts General Laws c. 6, §172(c), 1. The conviction and probation records of: **Eric Hardy, DOB 10/5/70; formerly of: 6 Old Road, Salem, Massachusetts; presently residing: 15 Louis Lane, Hampstead, New Hampshire;** and all CORI criminal record information in the custody and record of the Probation Department and/or the Criminal History Systems Board ("CHSB"), and if granted access to a certified copy of Mr. Hardy's convictions and appearance of counsel, then and in such case:
3. CORI and other substantially similar information shall be used only by the plaintiff by and through her Counsel, for cross examination / impeachment of Mr. Hardy at trial of this matter and for trial strategy purposes, and that such information shall not be disclosed to unauthorized persons in violation of Massachusetts General Laws, c. 6, 167 et seq, or 803 CMR 2.00 et seq.

Signed under the pains and penalties of perjury, this 19th day of February, 2004:

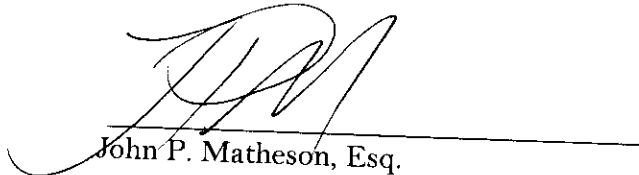

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CERTIFICATE OF SERVICE

I, John P. Matheson, counsel for Plaintiffs, do hereby certify that on this 19th day of February, 2004, I caused to be served a true copy of the foregoing upon Defendants, by mailing same, first class mail, postage pre-paid to their counsel of record:

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